

MAY-22-2008 14:24

IRINA P UAIMAN

718 743 6211

P.02

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

X

SOFIYA GIANBOLAJ,

Plaintiff,

08 Civ. 3003 (DLC)

-against-

BRAUN DIVISION OF GILLETTE,
THE GILLETTE COMPANY and PROCTER & GAMBLE
COMPANY,

Defendant.

X

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 6/11/08

STIPULATION REMANDING MATTER TO STATE COURT

IT IS HEREBY STIPULATED AND AGREED, by and between the below-named counsel for the parties to the above-captioned matter as follows:

WHEREAS this case was originally filed by the plaintiff in the Supreme Court for the State of New York located in Kings County; and

WHEREAS this case involves parties who are diverse to each other; and

WHEREAS the defendants in this case removed this case to this Federal Court on the basis of diversity; and

WHEREAS the parties have agreed that the amount in controversy, inclusive of interest, fees and costs, does not exceed SEVENTY-FOUR THOUSAND NINE HUNDRED NINETY-NINE DOLLARS (\$74,999.00); and

WHEREAS the plaintiff has agreed that under no circumstance shall any recovery in this matter, inclusive of interest, fees, and costs, exceed SEVENTY-FOUR THOUSAND NINE HUNDRED NINETY-NINE DOLLARS (\$74,999.00);

IT IS THEREFORE STIPULATED AND AGREED that

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1. It is appropriate for this matter be remanded to the Supreme Court of the State of New York for the County of Kings;

2. A photocopy or facsimile of this completely executed Stipulation may be filed with the Court as having the full force and effect as if the original were so filed; and

3. This Stipulation may be executed in counterparts; each counterpart shall be treated as an original and all counterparts together shall constitute one and the same instrument; and

4. Such Stipulation may be entered by either party against the other without further notice to any other party.

Dated: White Plains, New York
May 20, 2008

GOLDBERG SEGALLA, LLP

By: 

Brian T. Stapleton, Esq. (BS 5640)
Attorney for Defendants
THE GILLETTE COMPANY and
PROCTER & GAMBLE CO.
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IRINA P. VAIMAN, P.C.

By: 

Irina P. Vaiman, Esq.
Attorney for Plaintiff
SOFIYA GJANBOLAJ
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(718) 743-6611

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*The Clerk of Court shall remand
the action and close the
federal case, terminating all
pending motions.
Genuine Co.
June 11, 2008*